

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

KHALID ALBOUSHARI,

Defendant.

19-CR-17 (JMF)


ORDER

JESSE M. FURMAN, United States District Judge:

On February 14, 2023, the Court received the attached motion, dated February 7, 2023, from the Defendant. The motion is denied as frivolous and because the Defendant is represented by counsel, who may file motions on his behalf. *See, e.g., United States v. DiPietro*, No. 02 Cr. 1237 (SWK), 2007 WL 3130553, at * 1 (S.D.N.Y. Oct. 17, 2007) (“Pursuant to its docket-managing authority, a district court may reject purported *pro se* motions filed by a represented defendant.”); *United States v. de la Cruz*, No. 06 CR 1091 (SAS), 2007 WL 2325860, at *3 n.46 (S.D.N.Y. Aug. 13, 2007) (noting that a court has discretion to accept — and, by implication, reject — *pro se* submissions from a represented criminal defendant).

SO ORDERED.

Dated: February 14, 2023
New York, New York


JESSE M. FURMAN
United States District Judge

TRULINCS 91490054 - ALBOUSHARI, KHALID A - Unit: BRO-H-B

FROM: 91490054
TO: Fast, Elena
SUBJECT: Motion for Change of Venue (+2 Affidavits, sent 2/7
DATE: 02/07/2023 12:28:03 PM

US DISTRICT COURT
SOUTHERN DISTRICT of NEW YORK

UNITED STATES of AMERICA

vs.

Khalid Al-Boushari,
Defendant

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2023 FEB 13 AM 10:23

Elena Fast [Attorney of Record]
Khalid Al-Boushari, Pro Se
MDC Brooklyn
Metropolitan Detention Center
PO Box 329002
Brooklyn, NY 11232
Attorneys for the Defendant

MOTION FOR CHANGE OF VENUE

Relief Sought

Khalid Al-Boushari, Defendant, Moves the Court for an Order for Change of Venue to the Eastern District of New York, or, failing that, Release on Bail or Bond, pending trial.

Grounds for Relief

The Grounds for this Motion are (formally) Forum non Conveniens. Venue is inconvenient due to a perceived and well-founded suspicion of Bias, above and beyond the norm, on the Part of Southern District's Prosecutors and Judges, as well as other D.O.J. employees, past and present, and those, such as the Attorney of Record, Ms. Faust, who- having to deal with them everyday, are pressured into much more Conspicuous than Normal Degrees of Cooperation, at the expense of Mr. Al-Boushari et al. This is specifically because of a series of Independant Initiatives to Surveill, Co-opt, and Influence the Justice System, would be a euphemistic way to say it. The blackmail of Judges, Clerks, Prosecutors, and Others might be another way one might say it. Depends on your point of view.

Records Supporting Motion

This Motion is based on Pleadings and Papers on File in this case, THIS MOTION, and the ATTACHED AFFIDAVITS of Khalid Al-Boushari, Affiant, Taylor Cascio, Affiant, and those Affidavits and Exhibits which will be in each successive day's filing, while these motions are held and accumulated by such intermediaries as have intercepted previous mailings, to extract the maximum amount of supporting and incriminating documentation from me before allowing these through selectively.

Elena Fast, Counsel of Record (De Jure) for the Defendant

Khalid Al-Boushari, Pro Se Attorney (De Facto) for the Defendant

February 7th, 2022



TRULINCS 91490054 - ALBOUSHARI, KHALID A - Unit: BRO-H-B

FROM: 91490054
TO: Fast, Elena
SUBJECT: affidavit
DATE: 02/07/2023 01:35:11 PM

US DISTRICT COURT- SOUTHERN DISTRICT of NY

Pro Se Counsel for the Defendant
UNITED STATES of AMERICA
vs.
Khalid Al-Boushari, Defendant

Elena Fast, Attorney of Record
Khalid Al-Boushari, et al.,

Metropolitan Detention Center
PO Box 329002
Brooklyn NY 11232

Affidavit

[Please Excuse the FORMAT and LACK of NOTARY'S SIGNATURE, as Defendant is effectively without Assistance of Counsel, and is incarcerated, effectively with no ability to Communicate with the Outside World, except through his Attorney, who seems to be under Tremendous pressure from D.O.J. and/or others to provide no assistance that may allow him to speak with, or in front of, any authority. This is the case with his fellow "Unindicted Co-conspirators" in a case tangentially but not insubstantially related to this one. Among other reasons for discretion, he wishes to Appeal to some sort of neutral or uncompromised authority, without incriminating himself or anyone else.

He has, in fact, made documented efforts to have his lawyer and Investigator reach out to a Notary, but they have so far only delayed, and he does not wish to be effectively at the mercy of DOJ as to the timeline of his case, as they have reasons to Suppress aspects of such Initiatives as those unofficially nicknamed "Judicial Review" and "Judicial Watch"- the motto of the latter being 'No one is Above the Law', although it specifies no particular relief for those Buried by it.]

This motion has been Mailed, as observed by numerous witnesses, along with 2 Affidavits, on 2/7/22

I, Taylor Cascio, do hereby Attest to my personal role in the "Bugging" and Electronic Surveillance of the Offices of the US Attorney in the Southern District of NY, and offer as proof:

-Several pieces of solid evidence not currently attached for technical reasons, but about which I would be happy to expound on or be deposed about, or address in camera, say, as well as Copious Notes, both from my 15 or so years in the 'Illegal Wiretap' Industry, on paper and in the various phones and notes that I've given FBI over the years, which they have studiously managed to avoid acknowledging, as this would lock them into a story, and force them to accept that I will have an unbelievable amount of leverage over them, effectively forever, unless their proxies murder me, which will cause them more problems than I ever will.

-The City and Federal and NYPD cameras, in and around Federal Plaza in May-Jun 2021, and other times, as well as those on the roof of the Ultra-secure Construction site on the roof of Pace University at the time, hidden, by or in Decoy low-level 'Enterprise Cell Masts' and also by individuals working there at the time, who should be easy to identify, as the site required secure passes for admission through a turnstile. Audio from Directional Microphones should also be available.

I am personally visible there several times during this period, and countless times after; a number of these are indexed by the civil complaint forms or similar documents I filed on these occasions, as well as those filed at 85 Chambers St, and on, I believe, Friday, March 9th, 2022 at roughly noon, when I left Federal Plaza, walked to Eastern District, over the Brooklyn Bridge, stopped to inquire as to the Whereabouts of the FBI's Brooklyn resident office there (I was told by employees at the door of both the US Attorney for Eastern District, and the US Courthouse there at Cadman Plaza, as well as employees at Municipal buildings there, to go back over the Bridge to Federal Plaza, that there were no FBI offices there in Brooklyn.), and then filed a report with the US Attorney at EDNY, directing them to ask FBI to further clarify the details of this, but not to trust the Brooklyn-Queens Offices of the FBI, to instead speak to the Field Office in Manhattan. In Retrospect, this may have been a mistake, I'm not sure what, if anything, transpired between all these parties, nor will they admit it to me, because that would give me the opportunity to poke holes in whatever story they settle on.

On one of these Dates in May-June, the cameras can clearly see some Associates of mine [who I will decline to name] through the window of the US attorney's Office at St. Andrew's Plaza, there with what we'll call a 'Fake Work Order' for purposes of Succintness and Discretion, moving the furniture around pointlessly in the Offices, visible through the window. This was during the Covid-19 epidemic, so the place was near-empty, but I can identify the DOJ 'gatekeepers' there that day, although I would rather not. It was very close to the date a certain statue outside was either erected or moved out front, as a time frame for the cameras.


TRULINCS 91490054 - ALBOUSHARI, KHALID A - Unit: BRO-H-B

-I can offer significantly more proof of this, or of other aspects, details, results, etc. of the general surveillance there, of which I was a part, as well as that of related enterprises, as can Mr. Al-Boushari, if and when adequately prepped.

-Nevertheless I am purposefully proceeding slowly with this, as I do not completely blame DOJ for their involvement, and wish to minimize any public embarrassment, among other reasons.

I do swear that all the above is true,

Taylor Cascio



2/7/22

TRULINCS 91490054 - ALBOUSHARI, KHALID A - Unit: BRO-H-B

FROM: 91490054
TO: Fast, Elena
SUBJECT: 2nd Affidavit
DATE: 02/07/2023 01:57:50 PM

2nd Affidavit

I, Khalid Al- Boushari, being effectively Duly sworn, as much as is possible under the current circumstances, Swear that the following is True, to the Best of My Knowledge:

-I am a US Citizen, 60 Years Old, and have never committed a crime or a violation in any country.

-This case is entirely Fabricated by Our Federal Government. The Alleged Complainant was approached by FBI, and coerced into a statement, by both Threats and Bribes. This is Documented in emails between FBI and My wife, and supported by those between her and me, which are most likely in the 700 pages of Discovery Evidence I have not been allowed to see.

-I have a valid Marriage Certificate, recognized here. Under both United States Law and Muslim Law, I have the right to shared Custody, and there is no dissenting party. FBI, I have heard, got the information from their proxies, presumably from illegal surveillance, although possibly by illegal surveillance conducted by the Sudanese, Saudi, or UAE governments, or by parties at Etihad Airlines, and passed on to our Federal government, that indicated a vulnerability to exploit in my family life, in order to extract information from me, and/or have leverage or Counter-leverage over me.

-The same pattern can be seen in the Spurious threat of 10 years additional imprisonment for 'Passport Fraud Charges', which have cropped up immediately when I began talking about this, but which they would have charged me with when I was arrested, if there was any truth to them.

-You have destroyed my dignity and my family's dignity, as well as my family life. My mother is 85 years old and in poor health, and has no one else to assist her, I fear for her life, the longer I am incarcerated, without trial or conviction. My wife has been threatened, still, if she does not keep up with, respond to, and reluctantly assist the FBI's efforts. She has still been sending me money via Western Union, and sent me \$1000 to buy a plane ticket, long after she supposedly was accusing me of kidnapping.

KHALID ALBOUSHARI

KA

KHALID ALBOUSHARI

91490054

METROPOLITAN DETENTION CENTER

P.O. BOX 329002

BROOKLYN, NY 11232

NEW YORK NY 100

8 FEB 2023

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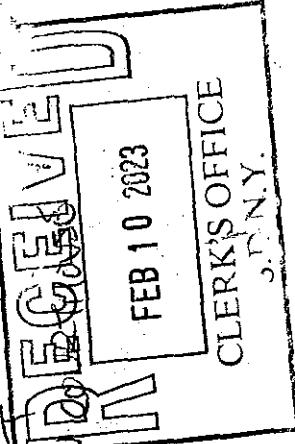
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PROSE

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CLERK OF THE COURT
DANIEL P. MOYNIHAN
500 PEARL ST.
[RM. 120]
NY NY 10007-1312

USMP3
SDNY

10007-131253

